

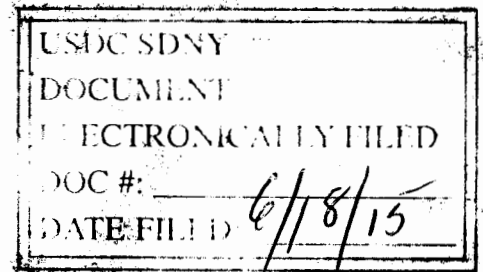
## JPMORGAN CHASE & CO.

Joshua Glick, Esq.  
Vice President, Assistant General Counsel  
Legal Department

June 18, 2015

**BY E-MAIL AND U.S. MAIL**

Nathaniel P.T. Read, Esq.  
Cohen & Gresser LLP  
800 Third Avenue  
New York, NY 10022



Re: *Dodona I, LLC v. Goldman, Sachs & Co., et al.*,  
No. 10-cv-7497 (VM) (DCF) (S.D.N.Y.)

Dear Nathaniel:

I write on behalf of third party JPMorgan Chase & Co. ("JPMC"), in response to the Court's June 4, 2015 Minute Order permitting third-party responses to the Court's June 3, 2015 Order to show cause "as to why those portions of the summary judgment motion record in this case that do not contain confidential trade secrets or other proprietary business information ... should not be unsealed." Dkt. No. 228.

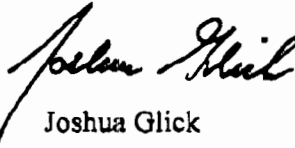
JPMC has received a letter and e-mail from counsel for Defendants identifying certain documents produced by JPMC that have been filed by the parties in connection with Defendants' motions for summary judgment, and are subject to the Court's June 3, 2015 Order. These documents bear production numbers JPMC 0001 – JPMC 0008.

Documents JPMC 0007 – JPMC 0008 contain the identities, addresses, and positions of several non-party JPMC customers. Non-party financial information is appropriate subject matter for under seal treatment. *See, e.g., Strauss v. Credit Lyonnais, S.A.*, 2011 WL 4736359, at \*4 (E.D.N.Y. Oct. 6, 2011) (observing that "[c]ourts have recognized that banking customers have a justifiable expectation of privacy that their names and financial records not be revealed to the public" and collecting supporting citations); *Caxton Int'l Ltd. v. Reserve Int'l Liquidity Fund, Ltd.*, 2009 WL 2365246, at \*6-7 (S.D.N.Y. July 30, 2009) (directing parties to make redactions necessary to "protect the identity of non-party investors"); *Broadhurst Investments, LP v. Bank of New York Mellon*, 2010 WL 3154840, at \*6 (S.D.N.Y. Aug. 2, 2010) (permitting under seal filing of exhibits containing "financial information of non-parties"). Accordingly, in the interest of maintaining the confidentiality of its customers' financial information, JPMC requests that

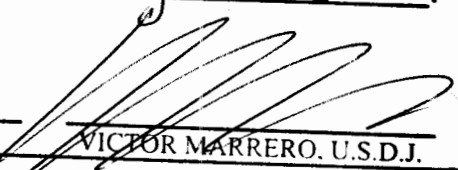
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documents JPMC 0007 – JPMC 0008 remain under seal or be filed in redacted form to protect the identities of its non-party customers.<sup>1</sup>

Sincerely,

  
Joshua Glick

cc: Hon. Victor Marrero, U.S. District Judge (via facsimile)  
Jon Lambiras, Esq. (via e-mail)

The Clerk of Court is directed to enter into the public record of this action the letter above submitted to the Court by <u>non-party JPMorgan Chase</u>	
SO ORDERED.	
<u>6-18-15</u> DATE	 VICTOR MARRERO, U.S.D.J.

<sup>1</sup> Documents JPMC 0001 – JPMC 0006 contain identifying information specific to Defendants. JPMC understands that Defendants have not opposed unsealing those documents, and therefore JPMC lodges no objection to their unsealing.